

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Claimant, Arian X. Fontal

Claim Number: 49501

Chapter 11

Case No. 22-11068 (KBO)

Ref. Doc. 31797

(Jointly Administered)

Objection Deadline: October 6, 2025 at 4:00 P.M. ET

(By agreement)

CLAIMANT 49501'S RESPONSE
IN OPPOSITION TO THE DEBTORS' 190th OMNIBUS OBJECTION

Claimant 49501, Arian X. Fontal, hereby submits this response to the Debtors' 190th Omnibus Objection. In the 190th Omnibus Objection, the Debtors objected to the Claimant's Proof of Claim, stating that "the FTX Recovery Trust submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts". See Schedule 1 of Debtors' 190th Omnibus Objection (Doc. No. 31797-2) at p. 7.

FTX Trading Ltd. 22-11068 (KBO)
One Hundred Ninetieth Omnibus Claims Objection
Schedule 1 - Modified claims

Asserted Claims					Modified Claims	
Claim Number	Name	Debtor	Tickers	Ticker Quantiv	Debtor	Ticker Quantiv
49501*	Name on file	West Realm Shires Services Inc.	BF_POINT	100.00000000000000	West Realm Shires Services Inc.	100.00000000000000
			BRZ	1.0000000000000000		1.0000000000000000
			BTC	0.1121895900000000		0.1121895900000000
			CUSDT	1.0000000000000000		1.0000000000000000
			DOGE	1.0000000000000000		1.0000000000000000
			ETH	1.6380041500000000		1.6380041500000000
			ETHW	1.302903072611476		1.302903072611476
			LTC	14.814667960000000		14.814667960000000
			NFT (493551617205124038/ENTRANCE VOUCHER #2306)	1.0000000000000000		1.0000000000000000
			SHIB	20.000000000000000		20.000000000000000
			TRX	1.0000000000000000		1.0000000000000000
			USD	25,010.804977128966000		12,507.904977129000000

Reason: The FTX Recovery Trust has conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the FTX Recovery Trust submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the FTX Recovery Trust seeks to modify the asserted claim to match their books and records.

Even though Claimant agrees with the other assets that remain in the Debtors' records, there is a clear discrepancy regarding the USD: in the Thirty-Second (Substantive) Objection, and according to the Debtors' own records, the total asset for the USD was indicated as

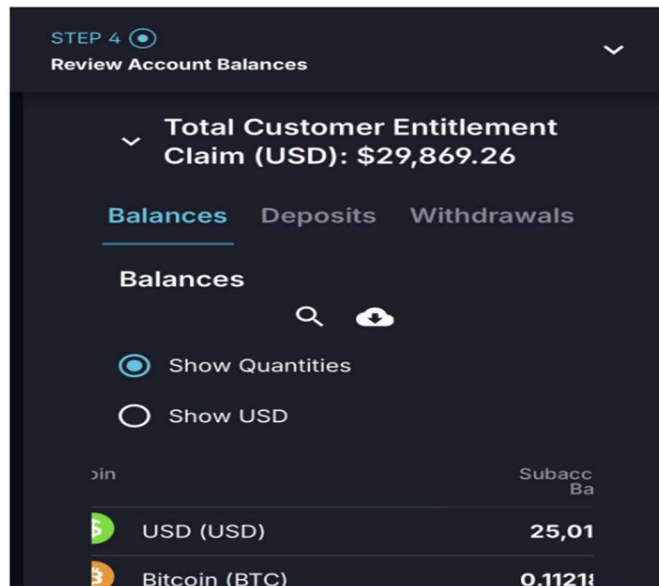
\$25,010,804.977128966000. *See* Order Granting Debtor's Thirty-Second Omnibus Objection to Claims, Doc No. 19967-1 at page 7.

Subsequently, without any explanation, reasonable justification, or evidentiary support, the Debtors attempted to alter this value to \$12,507,904.977129000, which is inconsistent with their prior statements and undermines the credibility of their current objection. The chart below is from the Order Granting the Thirty-Second (Substantive) Omnibus Objection.

Claim Number	Name	Debtor	Asserted Claims		Debtor	Modified Claim
			Tickers	Ticker Quantity		Ticker Quantity
49501	Name on file	FTX Trading Ltd.	BF_POINT		West Realm Shires Services Inc.	100.00000000000000
			BRZ	1.0000000000000000		1.0000000000000000
			BTC	11,218,959.0000000000000000		0.1121895900000000
			CUSDT	1.0000000000000000		1.0000000000000000
			DOGE	1.0000000000000000		1.0000000000000000
			ETH	163,800,415.0000000000000000		1.6380041500000000
			ETHW	1,302,903,073.0000000000000000		1.302903072611476
			LTC	1,481,466,796.0000000000000000		14.8146679600000000
			NFT (493551617205124038/ENTRANCE VOUCHER #2306)	1.0000000000000000		1.0000000000000000
			SHIB	20.0000000000000000		20.0000000000000000
			TRX	1.0000000000000000		1.0000000000000000
			USD	25,010.8000000000000000		25,010.804977128966000

Furthermore, the Thirty-Second (Substantive) Omnibus Objection was previously sustained by this Court on July 10, 2024, confirming the validity of the USD asset as reflected in the Debtors' own records. The Debtors' subsequent, unexplained attempt to alter this value represents a direct contradiction of their prior filings and the Court's determination, creating an inconsistency between their communications and official records. Such a unilateral and unsupported change not only undermines the reliability of the Debtors' current objection but also directly threatens Claimant's ability to recover the assets to which he is entitled.

Accordingly, the Debtors' Customer Claims Portal confirms that the total USD asset continues to reflect \$25,010.804977128966000, which is consistent with the amount indicated by the Debtors in the Thirty-Second (Substantive) Omnibus Objection and confirmed in the order previously sustained by this Court.:



Given that the Debtors' records reflect a total USD asset of \$25,010.804977128966000, which aligns with the Thirty-Second (Substantive) Omnibus Objection and the order previously sustained by this Court, and considering the other assets held in the Claimant's account, the total amount of the Claimant's claim is \$29,869.26 USD, as follows

USD: \$25,010.804977128966000

BTC*: \$ 0.11218959 x \$16,871.63 = \$ 1,892.22

ETH: \$1.63800415 x \$1,258.84

LTC: \$14.814667960000000 x \$60.6106 = \$ 897.18

ETHW \$1.302903072611476 x \$4.1505988 = \$ 5.41

BRZ: \$1.000000000000000 x \$0.1562968 = 0.16

DOGE: \$1.000000000000000 x \$0.0828523 = 0.08

TRX: \$1.000000000000000 x \$0.0556107 = 0.06

SHIB: \$20.000000000000000 x \$0.0000098 = 0.0002

BF_POINT: \$100.000000000000000 x 0.0000

CUSDT: \$1.000000000000000 X 0.0218002) \$0.0218

Total: \$ 29,869.26USD

In light of the clear discrepancy in the Debtors' records and their unsupported attempt to alter the USD asset, the Debtors' 190th (Substantive) Omnibus Objection lacks merit and should therefore be denied.

As such, the Claimant respectfully disagrees with the Debtors' objection, as the Debtors' own Customer Claims Portal shows that Claimant 49501 is, at a minimum, entitled to a total of \$29,869.26 USD, which includes \$25,010.804977128966000 in USD as reflected in the Debtors' records.

WHEREFORE, the Claimant respectfully requests this Court to deny the Debtors' 190th (Substantive) Omnibus Objection and to set the USD asset at \$25,010.804977128966000, as clearly indicated in the Debtors' own records.

Dated: October 1, 2025

/s/ Deirdre M. Richards
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